



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
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ARLINGTON, TEXAS 76011-4125

September 1, 2009

Stewart B. Minahan, Vice  
President-Nuclear and CNO  
Nebraska Public Power District  
72676 648A Avenue  
Brownville, NE 68321

SUBJECT: MIDCYCLE PERFORMANCE REVIEW AND INSPECTION PLAN -  
COOPER NUCLEAR STATION

Dear Mr. Minahan:

On August 5, 2009, the NRC staff completed its performance review of Cooper Nuclear Station for the first half of the calendar year 2009 assessment cycle. Our technical staff reviewed performance indicators for the most recent quarter and inspection results over the previous 12 months. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for future inspections at your facility.

This performance review and enclosed inspection plan do not include security information. A separate letter designated and marked as "Official Use Only – Security-Related Information" will include the security cornerstone review and resultant inspection plan.

Plant performance for the most recent quarter at Cooper Nuclear Station was within the Regulatory Response column of the NRC's Action Matrix based on a White performance indicator performance indicator for Mitigating Systems Performance Index - Emergency ac Power and all inspection findings being classified as having very low safety significance (Green). The performance indicator crossed the Green-White threshold in the fourth quarter of 2008 as a result of a failure of the Division 2 emergency diesel generator from a fault in the fuel oil transfer system on October 31, 2008. The performance indicator returned to Green in the first quarter of 2009 after you made changes to the station risk model to include the installation of a portable battery-charging diesel generator.

Consistent with the guidance of Inspection Manual Chapter 0305, "Operating Reactor Assessment Program," the NRC conducted a supplemental inspection using Inspection Procedure 95001, "Supplemental Inspection for One or Two White Inputs in a Strategic Performance Area," on June 30, 2009. The supplemental inspection determined that you performed a thorough evaluation in which specific problems were identified, an adequate root cause evaluation was performed, and corrective actions were taken or planned to prevent recurrence. Therefore, we plan to conduct reactor oversight process baseline inspections at your facility for the remainder of this cycle.

In the 2008 end-of-cycle assessment letter, the staff identified that there were more than three green or safety significant inspection findings for the current 12-month assessment period with documented crosscutting aspects in the area of human performance, with a crosscutting theme

in the aspect of human error prevention techniques [H.4 (a)] associated with these findings. Over the course of this assessment period, the staff identified that a crosscutting theme still exists in this area, with five findings associated with the aspect of human error prevention techniques. In addition, the staff identified that a new crosscutting theme in the use of conservative assumptions in decision-making [H.1 (b)] has emerged with five findings over this assessment period, four of which occurred in the past six months. In evaluating the scope of efforts and progress in addressing the crosscutting theme of human error prevention techniques, the staff determined that you appropriately recognized this theme and implemented a range of corrective actions to address it. Based on a review of these corrective actions through the baseline inspection program, the staff concluded the identified corrective actions were appropriate. For the crosscutting theme involving the use of conservative assumptions in decision making, the staff determined that you appropriately recognized the theme and developed corrective actions to address it, but a reasonable duration of time has not passed for the staff to determine the effectiveness of your corrective actions. Therefore, the staff determined that a substantive crosscutting issue in human performance does not exist at this time. We will continue to closely monitor the progress of your corrective actions for both of the above crosscutting themes through the baseline inspection program over the next assessment period.

The staff also identified that there were more than three green or safety significant inspection findings for the current 12-month assessment period with documented crosscutting aspects in the area of problem identification and resolution, and there is a crosscutting theme in the corrective action program component associated with the thoroughness of problem evaluation aspect [P.1(c)]. In evaluating the scope of efforts and progress in addressing this crosscutting theme, the staff determined that you appropriately recognized the theme and developed corrective actions to address it. Because a reasonable duration of time has not passed for the staff to determine the effectiveness of your corrective actions, we have determined that a substantive crosscutting issue does not exist at this time. We will continue to closely monitor the progress of your corrective actions through the baseline inspection program over the next assessment period.

The enclosed inspection plan details the inspections, less those related to physical protection, scheduled through December 31, 2010. These plans include the baseline inspection program and unique inspections involving dry fuel storage and license renewal. The inspection plan is provided to allow for the resolution of any scheduling conflicts and personnel availability issues well in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The inspections in the last nine months of the inspection plan are tentative and may be revised at the end-of-cycle review. We are also evaluating potential changes to the inspection program in the radiation safety cornerstone. Consequently, some specific inspection procedures and the inspection schedule may be revised for 2010.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

If circumstances arise which cause us to change the inspection plan, we will contact you to discuss the change as soon as possible. Please contact Geoffrey Miller, Chief, Division of Reactor Projects, at (817) 860-8144 with any questions you may have regarding this letter or the inspection plan.

Sincerely,



Dwight D. Chamberlain, Director  
Division of Reactor Projects

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License: DPR-46

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Cooper Nuclear Station Inspection/Activity Plan

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Publicly Avail	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Sensitive	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Sens. Type Initials	GBM
RIV/SPE/DRP/	C:DRP/	D:DRS	D:DRP		
DLProulx	GBMiller	RJCaniano	DDChamberlain		
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Cooper

## Inspection / Activity Plan

09/01/2009 - 12/31/2010

Unit Number	Planned Dates Start End	Inspection Activity	Title	No. of Staff on Site
		<b>EXAM - INITIAL EXAM</b>		3
1	08/31/2009 09/04/2009	X02409	INITIAL EXAM-CNS (9/2009)	
1	09/21/2009 09/25/2009	X02409	INITIAL EXAM-CNS (9/2009)	
		<b>EB1-08 - INSERVICE INSPECTION</b>		2
1	10/01/2009 10/09/2009	IP 7111108G	Inservice Inspection Activities - BWR	
		<b>RP-ORS5 - OCCUPATIONAL RADIATION SAFETY</b>		2
1	10/05/2009 10/09/2009	IP 7112101	Access Control to Radiologically Significant Areas	
1	10/05/2009 10/09/2009	IP 7112102	ALARA Planning and Controls	
1	10/05/2009 10/09/2009	IP 71151	Performance Indicator Verification	
		<b>EB2-07T - TRIENNIAL HEAT SINK INSPECTION</b>		2
1	12/07/2009 12/11/2009	IP 7111107T	Heat Sink Performance	
		<b>RP-ORS1 - OCCUPATIONAL RADIATION SAFETY - ALARA</b>		1
1	03/08/2010 03/12/2010	IP 7112101	Access Control to Radiologically Significant Areas	
1	03/08/2010 03/12/2010	IP 7112102	ALARA Planning and Controls	
1	03/08/2010 03/12/2010	IP 71151-OR01	Occupational Exposure Control Effectiveness	
1	03/08/2010 03/12/2010	IP 71151-PR01	RETS/ODCM Radiological Effluent	
		<b>EP-1 - BIENNIAL EP EXERCISE INSPECTION</b>		3
1	07/19/2010 07/23/2010	IP 7111401	Exercise Evaluation	
1	07/19/2010 07/23/2010	IP 7111404	Emergency Action Level and Emergency Plan Changes	
1	07/19/2010 07/23/2010	IP 71151-EP01	Drill/Exercise Performance	
1	07/19/2010 07/23/2010	IP 71151-EP02	ERO Drill Participation	
1	07/19/2010 07/23/2010	IP 71151-EP03	Alert & Notification System	
		<b>EB1-21 - COMPONENT DESIGN BASIS INSPECTION</b>		6
1	07/19/2010 07/23/2010	IP 7111121	Component Design Bases Inspection	
1	08/02/2010 08/13/2010	IP 7111121	Component Design Bases Inspection	
		<b>RP-ORS1 - OCCUPATIONAL RADIATION SAFETY-ACRSA</b>		1
1	08/16/2010 08/20/2010	IP 7112101	Access Control to Radiologically Significant Areas	
1	08/16/2010 08/20/2010	IP 7112102	ALARA Planning and Controls	
1	08/16/2010 08/20/2010	IP 71151	Performance Indicator Verification	
		<b>EB2-05T - TRIENNIAL FIRE PROTECTION</b>		4
1	10/18/2010 10/22/2010	IP 7111105T	Fire Protection [Triennial]	
1	11/01/2010 11/05/2010	IP 7111105T	Fire Protection [Triennial]	
		<b>BRQ - OPERATOR REQUAL INSPECTION</b>		3
1	10/25/2010 10/29/2010	IP 7111111B	Licensed Operator Requalification Program	

This report does not include INPO and OUTAGE activities.

This report shows only on-site and announced inspection procedures.

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**Cooper**  
**Inspection / Activity Plan**  
**09/01/2009 - 12/31/2010**

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
	Start	End			
1	08/31/2009	09/04/2009	<b>EXAM</b>	<b>- INITIAL EXAM</b>	3
1	09/21/2009	09/25/2009	X02409	INITIAL EXAM-CNS (9/2009)	
1	10/01/2009	10/09/2009	X02409	INITIAL EXAM-CNS (9/2009)	
1	10/05/2009	10/09/2009	<b>EB1-08</b>	<b>- INSERVICE INSPECTION</b>	2
1	10/05/2009	10/09/2009	IP 7111108G	Inservice Inspection Activities - BWR	
1	10/05/2009	10/09/2009	<b>RP-ORS5</b>	<b>- OCCUPATIONAL RADIATION SAFETY</b>	2
1	10/05/2009	10/09/2009	IP 7112101	Access Control to Radiologically Significant Areas	
1	10/05/2009	10/09/2009	IP 7112102	ALARA Planning and Controls	
1	10/05/2009	10/09/2009	IP 71151	Performance Indicator Verification	
1	12/07/2009	12/11/2009	<b>EB2-07T</b>	<b>- TRIENNIAL HEAT SINK INSPECTION</b>	2
1	03/08/2010	03/12/2010	IP 7111107T	Heat Sink Performance	
1	03/08/2010	03/12/2010	<b>RP-ORS1</b>	<b>- OCCUPATIONAL RADIATION SAFETY - ALARA</b>	1
1	03/08/2010	03/12/2010	IP 7112101	Access Control to Radiologically Significant Areas	
1	03/08/2010	03/12/2010	IP 7112102	ALARA Planning and Controls	
1	03/08/2010	03/12/2010	IP 71151-OR01	Occupational Exposure Control Effectiveness	
1	03/08/2010	03/12/2010	IP 71151-PR01	RETS/ODCM Radiological Effluent	
1	07/19/2010	07/23/2010	<b>EP-1</b>	<b>- BIENNIAL EP EXERCISE INSPECTION</b>	3
1	07/19/2010	07/23/2010	IP 7111401	Exercise Evaluation	
1	07/19/2010	07/23/2010	IP 7111404	Emergency Action Level and Emergency Plan Changes	
1	07/19/2010	07/23/2010	IP 71151-EP01	Drill/Exercise Performance	
1	07/19/2010	07/23/2010	IP 71151-EP02	ERO Drill Participation	
1	07/19/2010	07/23/2010	IP 71151-EP03	Alert & Notification System	
1	07/19/2010	07/23/2010	<b>EB1-21</b>	<b>- COMPONENT DESIGN BASIS INSPECTION</b>	6
1	08/02/2010	08/13/2010	IP 7111121	Component Design Bases Inspection	
1	08/16/2010	08/20/2010	IP 7111121	Component Design Bases Inspection	
1	08/16/2010	08/20/2010	<b>RP-ORS1</b>	<b>- OCCUPATIONAL RADIATION SAFETY-ACRSA</b>	1
1	08/16/2010	08/20/2010	IP 7112101	Access Control to Radiologically Significant Areas	
1	08/16/2010	08/20/2010	IP 7112102	ALARA Planning and Controls	
1	08/16/2010	08/20/2010	IP 71151	Performance Indicator Verification	
1	10/18/2010	10/22/2010	<b>EB2-05T</b>	<b>- TRIENNIAL FIRE PROTECTION</b>	4
1	11/01/2010	11/05/2010	IP 7111105T	Fire Protection [Triennial]	
1	10/25/2010	10/29/2010	IP 7111105T	Fire Protection [Triennial]	
1	10/25/2010	10/29/2010	<b>BRQ</b>	<b>- OPERATOR REQUAL INSPECTION</b>	3
1	10/25/2010	10/29/2010	IP 7111111B	Licensed Operator Requalification Program	

This report does not include INPO and OUTAGE activities.  
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